

**M. T. TAYLOR, JR.**

ATTORNEY AT LAW

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615-794-0807

December 29, 1989

Ms. Kelly McCarthy  
Waste Management Division  
United States Environmental Protection Agency  
Region IV  
345 Courtland Street  
Atlanta, GA 30365

RE: Saad Site, Nashville, Tennessee

Dear Ms. McCarthy:

This will follow up our conversation of December 11, 1989 regarding the above matter. I represent Mr. Ron Marlin who is an officer of the corporation known as Nashville Barrel and Drum, Inc. Mr. Marlin and his father, William, were employees of the company known as Nashville Drum Service, Inc. During their employment, they answered to a Mr. David Wingard of Memphis, Tennessee. I believe he also owned a company known as Memphis Drum Service, Inc.

On June 22, 1981, Nashville Barrel and Drum, Inc. was chartered and on or about September 25, 1981 and September 30, 1981 documents were signed wherein Nashville Barrel and Drum, Inc. purchased the equipment and accounts receivable of Nashville Drum Service, Inc. and leased the premises occupied by Nashville Drum Service, Inc. on Mallory Lane in Franklin, Tennessee. Nashville Barrel and Drum is now located at the address you used on Crow Cut Road in Fairview, Tennessee.

My client advises that at no time did Nashville Barrel and Drum, Inc. or its employees acting on its behalf transact any waste disposal business with Mr. Saad or send or deliver any waste materials to the land site.

Neither Mr. William Marlin nor Mr. Ron Marlin worked at the Saad Site. Mr. Marlin advises that at the time Nashville Barrel and Drum, Inc. purchased the company and accounts receivable of Nashville Drum Service, Inc. it had not done business with Saad since 1979.

Mr. William Marlin advises that Saad was an independent contractor and that neither he nor Nashville Drum Service, Inc. had any control of its work. Mr. William Marlin further advises that he had no knowledge of Saad's business practices or methods.

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Ms. Kelly Mc Carthy, E.P.A.  
RE: Saad Site, Nashville, Tennessee

Should you have any questions, please feel free to  
contact me.

Sincerely yours,

*M. Thomas Taylor Jr.*

M. Thomas Taylor, Jr.

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MTT,jr:las

cc: Ms. Mary Johnson, EPA  
Mr. Ron Marlin